

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

Civil Division

Case No. 23-cv-21190-JEM

(to be filled in by the Clerk's Office)

Raz Ofer

Plaintiff(s)

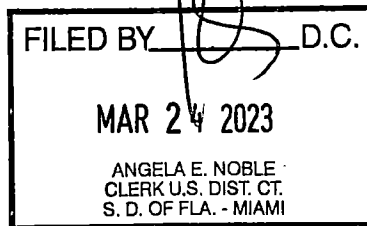
(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Judge Laurel M. Isicoff

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Raz Ofer		
Address	Paramount Miami World Center, 851 NE 1 st Ave, Miami,		
	Miami	Florida	33132
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Miami Dade		
Telephone Number	646 4317934		
E-Mail Address	raz.ofer2@gmail.com		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Judge Laurel M. Isicoff		
Job or Title <i>(if known)</i>	Judge		
Address	301 N Miami Ave		
	Miami	Florida	
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Miami Dade		
Telephone Number			
E-Mail Address <i>(if known)</i>	LMI_chambers@flsb.courts.gov		
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Defendant No. 2

Name			
Job or Title <i>(if known)</i>			
Address			
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number			
E-Mail Address <i>(if known)</i>			
<input type="checkbox"/> Individual capacity <input type="checkbox"/> Official capacity			

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Defendant No. 3

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐ Individual capacity☐ Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐ Individual capacity☐ Official capacity**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☒ Federal officials (a *Bivens* claim)

☐ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

1

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

1. Free Speech - Civil Rights (Constitutional).
 2. Racism (Antisemitism) - Constitutional Right - Criminal.
 3. Lack of Due Process - Refusing to let me load motions. Including, but not limited to, refusing to let me appeal her decisions, which is a constitutional right.
 4. Extortion - Fabricated threats of Felony of alleged illegal recording, at a time when the Defendant is the one that committed Felony (extortion) - Criminal. In addition, fabricated claims that I instigated the FBI investigation (Felony - Criminal).
 5. Use of ex-parte emails and ignoring ex-parte emails I produced between the other party and the Judge. - Due Process (Civil Rights).
 6. Confiscation and theft of Private Properties - Constitutional.
-

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

1. Defendant Judge Isicoff has conspired with her trustee friend and her other partners to deprive me of my properties rights in violation of the constitution and in breach of Federal and Florida law. They attempt to steal \$30M, enough to make several families very rich.
2. Restricted my free speech rights, by refusing to let me use or mention legal recording by the other party which implicated Isicoff in Criminal activities. Also, she issued an order that I'm not allowed to speak with tenants in my buildings. Ordered me to leave the Court room when I told the trustee that I'll refer these matters to the media. The same apply to the antisemitic affidavits, ordered me not speak or mention it.
3. Used Antisemitic comments and ordered me not to use or mention it. - Constitutional.
4. Due Process - Refused to let me load motions relating to appeal, recusal, replaced motions I loaded by other motions knowing the docket is monitored by the FBI. - (Constitutional). Also, arranged a fraudulent auction sale of a \$15M property without giving me the opportunity to redeem, as the trustee, with her full knowledge refused to give me a redemption statement. to let me appeal her decisions. Defendant acted illegally by helping the trustee to ignore the law when settling a claim. Defendant is co-operating with the trustee pursuing illegal activities of stealing properties from innocent people.
5. Criminal Activities - Threatened me with Felony when I mentioned a legal recording in a public place of the other party, which implicated the Judge in crimes. In addition, she refused to listen to the recording, which not only implicates her but the other party (her partners) admits they committed grand theft of \$12M property.
6. Defendant said in open Court that the FBI is corrupt as they follow my instructions. Although, she later withdrew her claim, it was too late, she said it in open Court. Defendant is in violation of Federal Laws.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

Miami.

B. What date and approximate time did the events giving rise to your claim(s) occur?

March 2022 until Present.

C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

1. Defendant conspired with her partners, a trustee and the other party, Stuart Kalb & Roniel Rodriguez to steal 2 properties of mine worth \$30M. One property she awarded to the other party who paid \$5 (five dollars) to a \$12M property alleging that a typo error I made on a QCD invalidates my Deed.

As far as the second property she is co-operating with the trustee and the same party to steal a \$15M property without any due process, refusing to let me appeal her decisions, refusing to let me load motions, assisting the trustee to artificially inflate claims ignoring established laws of title insurance, double judgments.

2. Defendant threatened me with felony when I mentioned a legal recording, in a public place, where the other party (her partners) mention her name and implicates her with her crimes, let alone discussing the fact they committed a Grand Theft. Isicoff even refused to listen to the tape when I mentioned it on 11/15/2022, let alone that she refused to hold an evidentiary hearing. Isicoff knew she was criminally extorting me not to mention or use this recording in order to conceal her crimes.

3. Isicoff ignored antisemitic comments made about me, supported by sworn affidavits, again ordered me not to use or mention it. The fact that these comments were made by Isicoff's partners, persuaded Isicoff that it is better to ignore these criminal and unconstitutional affidavits.

4. Defendant agreed for a broker friend and partner of the trustee to be appointed as a broker to handle a fraudulent auction, instead of appointing a recognized broker who sold many properties in South Beach, like Cushman Wakefield.

5. Judge Isicoff instructed the trustee not to give me a redemption statement required by law, so that I can't redeem the property. This way, Isicoff and the trustee can split the \$15M they stand to make when the property is sold at auction.

6. Isicoff ordered me not to speak with the media about these cases, at one point, when I mentioned the media, she made me leave her Court room. She knows that I talk to the media regularly.

7. Her partner, Stuart Kalb, threatened me with violence if I don't stop fighting Isicoff and him in Court.

8. Judge Isicoff is using illegal ex-parte emails with me and the other parties, I've all these ex-parte emails and they'll be produced in trial.

9. As part of her campaign against me, she said in open Court that the FBI is corrupt as their investigation against her is done as per my instructions. She unsuccessfully attempted to use her friend to influence the FBI. I've texts with the FBI proving the above and that she's under criminal investigation.

10. She attempted to tamper with the criminal investigation against her by ordering an investigation about me, in the same day I revealed that she is under criminal investigation by the FBI. Judge Isicoff did not realize that she was being watched when she did it.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

The threats, anti-semitic comments, restricting of my free speech rights, threats of confiscating private property have a detrimental effect on my health. I lost my consciousness several times and I often end up going to ER after hearings in her Courtroom. I suffer from a serious liver condition, see exhibit A. Exhibit B is the anti-semitic affidavits. My parents are of German origin, my Mom was 7 years old when police came to her class and told her to go home and that she can no longer come to school because she's Jewish. I flip when I hear any sort of anti-semitism.

In fact, today, 3/24/2023, I'm hospitalized in UM hospital with serious breathing difficulties connected to an Oxygen machine.

I used to work for the biggest IT companies in the world, such as Accenture in NY and British Airways in London (in their IT department, as an IT consultant, after graduating with a degree in computer science, this was before I started investing in real estate.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

- 1.1. Monetary damages due to a criminal conspiracy to steal 2 of my buildings - \$40M.
2. Damages to my health - \$10M.
3. Stay all proceedings pending an outcome of this complaint and pending appeal on all her decisions.
4. An order allowing me to file a motion to recuse Judge Isicoff as she confirmed I'm not allowed to file such a motion, in breach of Federal and Florida law. This is urgent, as it is clear she would deny it and I would need to appeal it with an emergency motion to Stay.

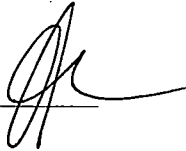
VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3/22/2023



Signature of Plaintiff Raz Ofer

Printed Name of Plaintiff Raz Ofer

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

City

State

Zip Code

Telephone Number _____

E-mail Address _____